Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 12-31-2011

SECTION I: GENERAL INFORMATION		CR-ERNS Number:	981320
Date of Initial Release:	6/30/2011	Date of Initial Call to NRC:	6/30/2011
Type of Report: Select from the drop-down list, the type of report that you are submitting	Annual Report		

Received
AUG 27 2012
Chemical Emergency Preparedness Program

Signed Statement: *I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(b) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.*

Date 3/23/12 *Name and Position* Rick Vannan *Signature*

Part A. Facility or Vessel Information

Name of Facility or Vessel: E.B Eddy Paper, Inc. (Domtar Corp)

Person in Charge of Facility or Vessel
Name: Rick Vannan Position: General Manager
Phone Number: (810) 984-9536 Alt Phone No.: (810) 982-0191

Facility Address or Vessel Port of Registration
Street: 1700 Washington Ave. County: St. Clair
City: Port Huron State: MI Zip Code: 48060

Dun and Bradstreet Number for Facility: 178301230

Facility/Vessel Location

	Deg	Min	Sec
Latitude	42	59	17
Longitude	-82	26	17

Vessel LORAN Coordinates:

NOTE: Latitude/Longitude information can be obtained at the following websites: http://www.satsig.net/maps/lat-long-finder.htm, http://earth.google.com/, and http://www.census.gov/geo/landview/. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel.	Over 2000 people / square mile

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)	Estimated Distance and Direction from Facility, if Known
Port Huron Hospital	0.45 miles SE
Emergent Wetland	0.97 miles NW

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 981,320

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source: Boiler #2

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to normal operations or treatment processes.

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

Natural gas is burned in Boiler #2. This boiler is used to supplement Boiler #5. NOx is generated and released during the combustion of natural gas. In 2011, the boiler was used for 138 days. Release calculations are based on AP-42, Section 1.4.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☐ Knowledge of Operating Procedures ☒ Engineering estimate ☐ Best Professional judgment

Other -

Continuous Release Reporting Form

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Name of Source: Boiler #2

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

■ **Stack** Indicate stack height in feet or meters: 70 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

☐ **Lake** Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Boiler #2

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Nitrogen Dioxide NO2	10102-44-0	7.8	1.04	138	143.92 lbs/year	All 12 months
Nitrogen Oxide NO	10102-43-9	140.4	18.77	138	2590.56 lbs/year	All 12 months
Nitrous Oxide N2O	10024-97-2	7.8	1.04	138	143.92 lbs/year	All 12 months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	OR Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 981,320

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source: Boiler #4

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to normal operations or treatment processes.

***Note** that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

Natural gas is burned in Boiler #4. This boiler is used as a back-up to Boiler #5. NOx is generated and released during the combustion of natural gas. In 2011, the boiler was used for 12 days. Release calculations are based on AP-42, Section 1.4.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☐ Knowledge of Operating Procedures ☒ Engineering estimate ☐ Best Professional judgment

Other -

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Name of Source: Boiler #4

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

■ **Stack** Indicate stack height in feet or meters: 102 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

☐ **Lake** Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Boiler #4

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Nitrogen DioxideNO2	10102-44-0	10.92 lbs/d	2.10 lbs/da	12	25.15 lbs/year	All 12 months
Nitrogen Oxide NO	10102-43-9	196.56 lbs	37.72 lbs/d	12	452.66 lbs/year	All 12 months
Nitrous Oxide N2O	10024-97-2	10.92 lbs/d	2.10 lbs/da	12	25.15 lbs/year	All 12 months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	OR Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release

SECTION II: SOURCE INFORMATION	CR-ERNS Number: 981,320

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source: Boiler #5

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to normal operations or treatment processes.

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

Coal is burned in Boiler #5 for 24 hours a day, 7 days a week for an average of 359 days per year. NOx is released during the combustion of coal. Release calculations are based on AP-42, Section 1.1 Emission Factors. Calculations for Boiler #5 include emissions from four (4) 5 mmBTU/hr natural gas fired igniters.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☐ Knowledge of Operating Procedures ☒ Engineering estimate ☐ Best Professional judgment

Other -

Continuous Release Reporting Form

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Name of Source: Boiler #5

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

■ **Stack** Indicate stack height in feet or meters: 135 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

☐ **Lake** Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Boiler #5

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Nitrogen Dioxide NO2	10102-44-0	129.00 lbs	94.68 lbs	355	33584.81 lbs/yr	All 12 months
Nitrogen Oxide NO	10102-43-9	2322.00 lb	1704.21 lbs	355	604526.58 lbs/yr	All 12 months
Nitrous Oxide N2O	10024-97-2	129.00 lbs	94.68 lbs	355	33584.81 lbs/yr	All 12 months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	**OR** Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 981,320

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source: Boiler #6

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to normal operations or treatment processes.

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

Natural gas is burned in Boiler #6. This boiler is used as supplement to Boiler #5. NOx is generated and released during the combustion of natural gas. In 2011, the boiler was used for 16 days. Release calculations are based on AP-42, Section 1.4.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☐ Knowledge of Operating Procedures ☒ Engineering estimate ☐ Best Professional judgment

Other -

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Name of Source: Boiler #6

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

■ **Stack** Indicate stack height in feet or meters: 70 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

☐ **Lake** Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 981320

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Boiler #6

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Nitrogen Dioxide NO2	10102-44-0	3.00 lbs/da	1.11 lbs/day	16	17.79 lbs/year	All 12 months
Nitrogen Oxide NO	10102-43-9	54.0lbs/da	20.01 lbs/da	16	320.22 lbs/year	All 12 months
Nitrous Oxide N2O	10024-97-2	3.00 lbs/da	1.11 lbs/day	16	17.79 lbs/year	All 12 months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	**OR** Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 981320

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Nitrous Oxide (N2O)

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Boiler #5 + #5 ignition	129.00 lbs/day
Boiler #2	7.80 lbs/day
Boiler #4	10.92 lbs/day
Boiler #6	3.00 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 150.72 Total All

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 981320

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Nitrogen Oxide (NO)

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Boiler #5 + #5 ignition	2322.00 lbs/day
Boiler #2	140.40 lbs/day
Boiler #4	196.56 lbs/day
Boiler #6	54.00 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 2712.96 Total All

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 981320

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Nitrogen Dioxide (NO2)

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Boiler #5 + #5 ignition	129.00 lbs/day
Boiler #2	7.80 lbs/day
Boiler #4	10.92 lbs/day
Boiler #6	3.00 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 150.72 Total All

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*